



June 13, 2008

Mr. Gary Evenson, Administrator
Telecommunications Division
Public Service Commission of Wisconsin
610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

Re: DOCKET NOS. 5-TN-100 & 5-TN-106
Response to Area Code Relief Implementation – Data Request

Dear Mr. Evenson:

Enclosed is CenturyTel response to the Commission's data request dated May 13, 2008 in the above reference dockets. Our response is being submitted via the Commission's ERF system under docket 5-TN-100.

Please call me at 608.441.5730 or email me at scott.girard@centurytel.com if you have questions.

Sincerely,

/s/ Scott Girard

Scott Girard
Manager of Regulatory/Government Relations
CenturyTel
10 E. Doty St, Suite 800
Madison, WI 53703

Enclosure

CenturyTel Response to Commission's Data Request
In
Dockets 5-TN-100 and 5-TN-106

Customer Education and Implementation Concerns with 715 and 920 NPA Relief

CenturyTel has been involved in both NPA overlays and NPA splits. Both means of NPA relief have their customer education and technical issues. CenturyTel can handle either process. CenturyTel has a large presence in both the 715 and 920 NPA service areas so we will have to deal with both the 715 and 920 NPA relief implementations order by the Commission.

A. An overlay is selected as the Commission's preferred method of relief in both area codes.

The state of Wisconsin has experienced several NPA splits but has not experienced an NPA overlay. For this reason, the customer education for an overlay may be a little more complex than the split process that the customers have previously experienced. Customer education will focus on need for 10 digit dialing for local calls; however, no customer's phone number will change if an overlay is select. All switches in the 715 and 920 NPA service areas will to be programmed for 10-digit dialing and translation tables will need to be updated.

If an overlay is chosen, CenturyTel's preference is that local dialing would simply be 10 digits and NOT allow permissive or mandatory 1+10 digit local dialing as some states have done. Customers get confused trying to determine what a toll call, a local is or EAS call when permissive or mandatory 1+10 digit dialing plans are required in an overlay implementation.

B. An overlay is selected as the Commission's preferred method of relief in one area code while a split is selected for the other area code.

Given the relief for the 715 and 920 NPA service areas are likely to be fairly close to one another, then implementing an overlay within one NPA and a split within the other NPA would cause additional work internally for CenturyTel and be especially confusing to customers. Forms of mass communication of different relief types could be especially confusing if the service area of a radio, television station or newspaper overlaps the two NPAs and each relief process is different. For example, an advertisement explaining a split for the 715 NPA could be quite confusing to a 920 customer viewing the advertisement when in fact the 920 customer's NPA is being overlaid. CenturyTel strongly recommends the Commission not adopt an overlay for one area code and a split for the other area code due to the problems involved given the proximity of the area codes and close timing of the relief plans.

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C. A split is selected as the Commission's preferred method of relief in both area codes.

As discussed above, CenturyTel has a large presence in both the 715 and 920 NPA service areas, so no matter what version of a split is selected we will have exchanges in both the existing and new area code in both service areas. Customer education will focus on explaining where the new area code boundaries are and informing customers in the new area of a change in their phone number. Customers in the new area code will be faced with additional costs and hassle of being required to have a new phone number. Switch Translation tables, as well as billing and provisioning tables will need to be updated to reflect the new area codes.

D. Miscellaneous

- 1. In addressing these issues, please indicate if your company's concerns differ based on whether the 715 or 920 relief effort takes place first.**

No.

- 2. Does your company have any particular concern about having relief efforts for the 715 and 920 area codes happening in such a close timeframe?**

Yes, the same people at CenturyTel are responsible for implementing area code relief in both 715 and 920 and relief efforts happening in such a close timeframe will be difficult.

- 3. Are there any particular problems that may arise for company if any of the of the implementation periods for the 715 area code overlap with the implementation periods for 920?**

As mentioned above, the same people are involved so if implementation periods overlap between the two area codes it will cause staffing problem. In addition, consumer education will be more difficult if there is overlap in the implementation of area code relief in the two area codes.

- 4. If so, what implementation steps (if any) should not overlap? Why?**

The permissive dialing periods should not overlap between the two area codes to minimize customer confusion and avoid programming problems. CenturyTel recommends whatever action is taken to relieve each NPA is be done as far apart as possible, we recommend a minimum of a year between the start of area code relief in one area code and the start of the area code relief in the other area code.